



ALIGNED FIBER COMPOSITES
Highway 52 South, Chatfield, MN 55923-9797
Telephone 507/867-3479

October 9, 1987

EPA Region 5 Records Ctr.



347808

Ms. Sherryl Livingston
Hazardous Waste Enforcement Unit
Solid and Hazardous Waste Division
Minnesota Pollution Control Agency
520 Lafayette Road
St. Paul, MN 55155

Dear Ms. Livingston:

This letter is in response to your letter to AFC dated September 11, 1987. The violations of the Minnesota Hazardous Waste Rules and the EPA Land Ban Disposal Regulations by AFC are addressed as follows:

STATE HAZARDOUS WASTE INSPECTION

1. Weekly Inspections

I've developed a check list for the weekly inspections of the hazardous waste storage area at AFC. Enclosed is a copy of the check list.

2. Personnel Training

On October 7, 1987, a training session was held for all employees who are involved with AFC's Hazardous Waste Management Program. We combined the initial training for new employees and the annual update training for all employees into one session. A copy of the attendance roster for this session is enclosed.

3. Contingency Plan

I've updated the Contingency Plan for AFC facilities. We are giving a tour of our facilities to the local police and fire departments on November 2, 1987 and I will submit the Contingency Plan to both departments at that time. Enclosed is a copy of the updated Contingency Plan.

F001-F005 LAND BAN INSPECTION

1. Written Notification

Enclosed is a copy of the form we will be using to notify the receiving facility of our F001-F005 solvent wastes. I believe this form contains all of the information required by the EPA Land Ban Disposal Regulations.

WORKING TOGETHER FOR TOMORROW'S PRODUCT . . . TODAY

2. Waste Stream Analysis

We do keep analyses of our "F" waste streams on file at our Manufacturing Plant. The analyses were done by the Hydrite Chemical Company, Milwaukee, Wisconsin (our receiving facility) and were submitted to the MPCA when we updated our Hazardous Waste Disclosure Statement.

If you have any questions regarding our response to specific violations or our Hazardous Waste Management Program in general, please call me at AFC.

Sincerely,

AFC, Inc.



Dennis Thorson
Plant Engineer

DT/lf
Enclosures

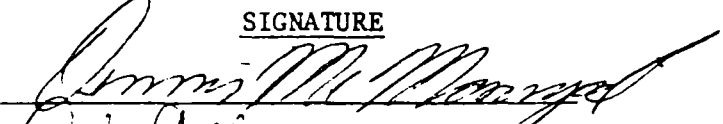
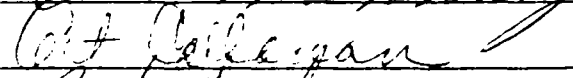
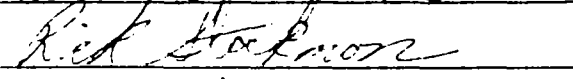
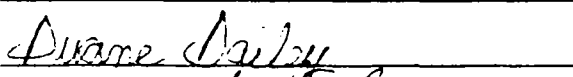

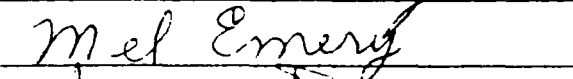
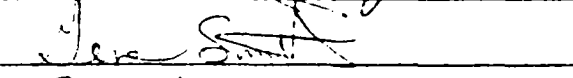
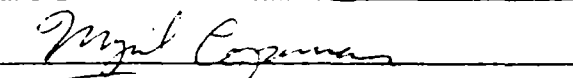
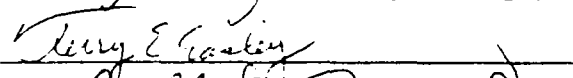

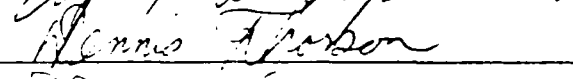



HAZARDOUS WASTE INSPECTION CHECK LIST

[illegible]

October 7, 1987

TRAINING SESSION FOR HAZARDOUS WASTE FACILITY PERSONNEL

<u>NAME</u>	<u>SIGNATURE</u>
Dennis McMonigal	
Art Callanan	
Rick Stockman	
Duane Dailey	
Mike Berg	
Mel Emery	
Gene Smith	
Myril Copeman	
Terry Easley	
Lyall Mensink	
Dennis Thorson	
Steve Miner	

AFC, INC. CONTINGENCY PLAN

- | | | | |
|----|-------------------------------|-------------------|----------------|
| I. | <u>EMERGENCY COORDINATORS</u> | <u>HOME PHONE</u> | <u>ADDRESS</u> |
| | A. Amy Donahoe | 867-4900 | Chatfield, MN |
| | B. Conrad Fingerson | 867-4432 | Chatfield, MN |
| | C. Dennis Thorson | 765-2506 | Preston, MN |
- II. EMERGENCY RESPONSE PROCEDURES
- A. FIRE AND EXPLOSION
1. If fire is in early stages (incipient) and can be controlled, attempt to extinguish with dry chemical fire extinguishers, NOTIFY SUPERVISOR AND FRONT OFFICE.
 2. If fire is spreading rapidly and cannot be controlled using portable fire extinguishers, CALL LOCAL FIRE DEPARTMENT (DIAL 9-911), NOTIFY SUPERVISOR, FRONT OFFICE AND EMERGENCY COORDINATOR. EVACUATE AREA.
 3. If fire threatens flammable materials or hazardous waste stored in other areas of the plant, EVACUATE FACILITY.
- B. CHEMICAL SPILLS OR LEAKS INCLUDING HAZARDOUS WASTE
1. For flammable liquids, eliminate all sources of ignition.
 2. Clear people from area.
 3. Notify supervisor and front office.
 4. Determine source of leak and try to stop, if possible.
 5. Obtain MATERIAL SAFETY DATA SHEET for substance.
 6. Obtain personal protective equipment and other supplies needed to safely clean up spill. These items are stored in our supply crib.
 7. Place spilled material into drums and properly label contents.
 8. Notify Minnesota Pollution Control Agency Emergency Response Unit if spill is significant.

C. MEDICAL EMERGENCIES

1. Give EMERGENCY FIRST AID.
2. NOTIFY FRONT OFFICE
3. For injuries requiring ambulance, CALL CHATFIELD AMBULANCE SERVICE (DIAL 9-911).
4. Victims are normally transported to Chatfield Medical Center or to St. Mary's Hospital in Rochester via the Chatfield ambulance or AFC drivers.

D. WEATHER RELATED EMERGENCIES

1. Summer Storms: Warnings to take cover in designated shelter areas will be given over the public address system or by word of mouth should the public address system fail. See Figure No. 1 and Figure No. 2 in back of Contingency Plan.
2. Power Failures:
 - a. Shut off 440 Volt Circuit Breakers in Manufacturing Building until 3-phase power is restored.
 - b. Report power failures to Interstate Power Company (867-4020).
 - c. If power will be off for an extended period of time, implement shut-down procedures for Pultrusion Machines.

III. EMERGENCY EQUIPMENT

A. COMMUNICATION SYSTEMS

Telephones (other than office phones) accessing both the public address system and an outside line for emergency services are located in the following areas.

1. Station 275 - Manufacturing Floor Desk
2. Station 276 - Assembly Manager's Office
3. Station 277 - Backyard Emergency

B. FIRE FIGHTING EQUIPMENT

1. All buildings at Sales Plant and Manufacturing Plant are protected by Automatic Sprinkler Systems.
2. Dry Chemical Fire Extinguishers are located throughout both Sales and Manufacturing Plant.

C. SPILL CONTAINMENT EQUIPMENT

1. Sand
2. Oil Absorbent Pads - Maintenance Shop
3. Floor Dry - Maintenance Shop

D. PERSONAL PROTECTIVE EQUIPMENT

1. Dust Respirators
2. Organic Vapor Respirators
3. Safety Glasses
4. Goggles
5. Full Face Shields
6. Rubber Gloves
7. Cloth Gloves
8. Neoprene Gloves
9. Rubber Aprons
10. Hard Hats
11. Emergency Eye Wash Stations

IV. FACILITY EVACUATION

A. EVACUATION ROUTES

1. Sales Plant - See Figure No. 3.
2. Manufacturing Plant - See Figure No. 4.

B. EVACUATION PROCEDURES

When notification has been given to evacuate a building, employees should exit building in an orderly fashion and assemble (by department) in the following areas:

1. Sales Plant - Visitor Parking Area
2. Manufacturing Plant - Employee Parking Lot

EVACUATION PROCEDURES (Continued)

Department Managers are to then take a head count and determine if any employees are missing. This information should be give to the Emergency Coordinator.

Employees not assigned to a specific department will be included on a separate employee check list.

V. ARRANGEMENTS WITH LOCAL POLICE AND FIRE DEPARTMENTS

- A. Tours of AFC facilities will be given annually to the local police and fire departments.
- B. Updated Contingency Plans will be distributed to the local authorities during the annual plant tours.

Restricted Waste Notification
For Off-Site Treatment
40 CFR 264.73(b)(11) & 268.7(a)(1)

From Generator _____

To
The Waste listed on Manifest # _____
contains Restricted Wastes U.S. EPA ID# _____

___F001 ___F002 ___F003 ___F004 ___F005
which include the following solvents

___ethyl ether	___tetrachloroethylene
___methyl isobutyl ketone	___trichloroethylene
___n-butyl alcohol	___methylene chloride
___cyclohexanone	___1,1,1-trichloroethane
___methanol	___carbon tetrachloride
___cresols (cresylic acid)	___chlorobenzene
___toluene	___1,1,2-trichloro-1,2,2-trifluoroethane
___isobutanol	___ortho-dichlorobenzene
___carbon disulfide	___trichlorofluoromethane
___nitrobenzene	___xylene
___pyridine	___acetone
___methyl ethyl ketone	___ethyl acetate
	___ethyl benzene

This waste is suitable for treatment technologies as listed in 40CFR260 et al., which are:

Batch Distillation, Thin Film Evaporation, Fractionation, Incineration, Steam Stripping, Biological Treatment, Carbon Absorption, Air Stripping, Wet Air Oxidation.

I certify that, to the best of my knowledge, the above information is true, accurate, and complete.

Name _____

Signature _____ Date _____